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ILLINOIS COMMERCE COMMISSION

BEFORE THE
ILLINOIS COMMERCE COMMISSION

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COMMERCE COMMISSION
2003 JUN 31 A 10:58

Allegiance Telecom of Illinois, Inc.)

Petition for Extension of Waiver of)
83 Ill. Admin. Code Sections)
725.500(o) and 725.620(b))

Docket No. 03-0075

PETITION FOR EXTENSION OF WAIVER

Allegiance Telecom of Illinois, Inc. ("Allegiance"), pursuant to 83 Ill. Admin. Code § 725.101, hereby requests a one-year extension of its waiver of 83 Ill. Admin. Code §§725.500(o) and 725.620(b). In support of this request Allegiance states as follows:

1. Allegiance is Delaware corporation that provides competitive local exchange and interexchange telecommunications services in Illinois.
2. On January 12, 2000 in Docket No. 99-0633, on February 21, 2001 in Docket No. 00-0800, and on February 27, 2002 in Docket No. 02-0013, the Commission issued orders granting Allegiance one-year extensions of an initial waiver of compliance with the requirements of 83 Ill. Admin. Code §§ 725.500(o) and 725.620(b). Pursuant to Section 725.101(b), the Commission granted the initial waiver to Allegiance on September 23, 1998 in Docket No. 98-0475.
3. Sections 725.500(o) and 725.620(b) require that a call box be installed at a local exchange carrier ("LEC") switch to allow a public safety answering point ("PSAP") employee to field 9-1-1 calls from that switch in the event of a trunking problem between the Central Office and the PSAP. These

provisions do not contemplate a LEC, like Allegiance, that has a single switch serving multiple PSAPs.

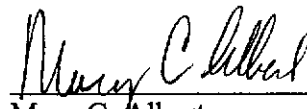
4. Carriers may seek a waiver of Sections 725.500(o) and 725.620(b) if they can show that "the provision is either technologically infeasible or that it is financially incapable of complying with the requirement." § 725.101(a).
5. As a basis for granting Allegiance's third extension of the call box waiver in Docket 02-0013, the Commission found that it is technologically infeasible for Allegiance to comply with the provisions of Sections 725.500(o) and 725.620(b) of the Commission's rules. The Commission also ordered Allegiance to always ensure that a minimum of two facility paths between its central office and the 9-1-1 selective routers are provided, each with a minimum of two 9-1-1 trunk groups and to maintain its system for notifying within 15 minutes after a confirmed outage, the primary point of contact of any isolated 9-1-1 system pursuant to Section 725.500(p) of the Commission's rules. Allegiance remains in compliance with the Commission's directive regarding diversity of routing and its directive regarding notification of system outages.
6. In its most recent order extending the waiver in Docket No. 02-0013, the Commission also found that Allegiance may request a fourth extension of the waiver if revisions to Part 725 had not been completed within one year. While the Commission Staff held workshops last year to address the issue of rewriting Part 725, including revisions that would allow the type

of diverse routing used by Allegiance to substitute for the call box requirement, revisions have not yet been adopted.

7. The considerations giving rise to the grant of the initial waiver and the subsequent extensions are equally applicable today. It continues to be technologically infeasible for Allegiance to comply with the provisions of Sections 725.500(o) and 725.620(b). Moreover, Allegiance will continue to provide a minimum of two facility paths between its central office and the 9-1-1 selective routers, along with a minimum of two 9-1-1 trunks in each facility path. Therefore, Allegiance requests that it be granted a further extension of the waiver for another one-year period.
8. Allegiance is willing to accept service by electronic means in this docket, in accordance with the Commission's Rules of Practice.

WHEREFORE, Allegiance Telecom of Illinois, Inc. hereby requests that the Commission grant a one-year extension of its waiver of 83 Ill. Admin. Code §§ 725.500(o) and 725.620(b).

Respectfully submitted,



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Dated: January 30, 2002

CITY OF WASHINGTON)
)
DISTRICT OF COLUMBIA)

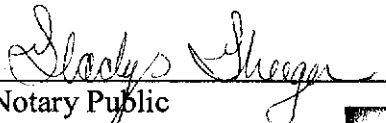
VERIFICATION

I, Mary C. Albert, being first duly sworn upon oath depose and say that I am Vice President, Regulatory and Interconnection for Allegiance Telecom of Illinois, Inc., a Delaware corporation; that I am authorized to make this Verification on its behalf; that I have read the foregoing Petition for Extension of Waiver by me subscribed and know the contents thereof; and that said contents are true and correct to the best of my knowledge, information and belief.




Mary C. Albert

Subscribed and sworn to before me this 30th day of January, 2003



Notary Public

 Gladys G. Leeger
Notary Public, District of Columbia
My Commission Expires February 14, 2005

My Commission expires: _____